May-12-2005 06:12 From- T-784 P.010/013 F-470

Appl. No.: 09/842,052 Amdt, dated 05/12/2005

Reply to Office action of January 12, 2005

REMARKS

This Amendment is filed in response to the Office Action dated January 12, 2005.

Applicants appreciate the Examiner's thorough examination of the application as evidenced by the Office Action. Applicant have amended Claim 1 and added new Claims 11-26. Applicant respectfully submits that the claims are patentable and requests reconsideration and allowance of the application in light of the following remarks.

I. Summary of Rejections

The Office Action rejects Claims 1-10 of the application as anticipated by U.S. Patent No. 5,358,230 to Ikemori. The Office Action alleges that all aspects of the claims are anticipated by the disclosure at col. 1, lines 33 – col. 3, line 14; col. 7, line 42- col. 10, line 56). The Office Action does not specifically point to features of the disclosure of the '230 Ikemori patent as corresponding to the claim elements.

II. Description of the Invention

The claimed invention relates to a mechanism for feeding media into a printer. The system uses a drive element for contacting media in a loader and driving media from the loader to the printer. The system also includes an isolation device associated with the drive element. The isolation device is capable of being selectively positioned between the drive element and the media units. When located between the drive element and the media units, the isolation device isolates the drive element from the media units, such that media units are not driven into the printer. Notably, the isolation device is both connected and actuated by the motor of the printer. As the motor turns, it alters the position of the isolation device placing it either between the drive element and the media or allowing the drive element to contact the media units. In some embodiments, the drive element, isolation device, and the mechanism for transferring the media along the print path are all connected to the same motor. As the motor operates, the drive element, isolation device and transfer mechanism work in unison to provide media to the printer.

May-12-2005 06:12 From- T-784 P.011/013 F-470

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III. Independent Claims 1 and 11 Are Patentable

Among other things, independent Claims 1 and 11 both recite that the isolation device is both connected to and actuated by the motor of the printer. Applicants respectfully submit that this aspect of the claimed invention is nowhere taught or suggested by the claimed invention.

It is difficult to determine from the text what the Office Action believes to be the isolation device in the system disclosed in the '230 Ikemori patent. Applicants submit that the isolation device is the actuator S1 and rod R. The actuator S1 operates the rod R. Rod R selectively allows the drive element 117 to either contact or be isolated from the sheets of the paper. As is clear from Figure 1 of the '230 Ikemori patent, the actuator S1 and rod R are in no way coupled to or actuated by the motor M of the printer.

One may argue that the isolation device is the cam C1 disclosed in the '230 Ikemori patent. While the cam C1 may be coupled to the motor M, it is not actuated by the motor. Instead, it is actuated by the actuator S1 and rod R. Independent Claims 1 and 11 specifically recite that the printer motor actuates the isolation device.

As the '230 Ikemori patent fails to teach or suggest an isolation device coupled to an actuated by a motor of the printer, independent Claims 1 and 11 are neither anticipated or obvious in light of the '230 Ikemori patent.

Applicants therefore respectfully submit that Claims 1 and 11, as well as the claims that depend therefrom are patentable.

IV. Independent Claim 20 Is Patentable

Independent Claim 20, among other things, recites that the <u>first drive element is located</u> in the isolating device. The isolating device in a first position isolates the first drive element from the media units and in a second position allows the first drive element to contact the media units in the loader. The drive element 117 of the '230 Ikemori patent is not located inside the isolation device (actuator S1 and rod R). This is neither taught or suggested by the '230 Ikemori

May-12-2005 06:12 From- T-784 P.012/013 F-470

Appl. No.: 09/842,052 Amdt. dated 05/12/2005

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patent. Applicants therefore respectfully submit that Claim 20, as well as the claims that depend therefrom, is patentable over the cited art.

V. Independent Claim 25 Is Patentable

As illustrated in Figure 2 of the patent application, the printer includes a linkage 8 between the motor 3 of the printer and the isolation device 17. The linkage is such that every time the motor rotates, the isolation device also rotates. Isolation of the media unit from the drive element is achieved by the enclosure of the isolation device. This aspect of the claimed invention nowhere taught or suggested by '230 Ikemori patent. Specifically, in the '230 Ikemori patent, the isolation device is not coupled to the motor such that it always rotates when the motor rotates. Instead, the isolation device only rotates with the motor when actuated by the actuator \$1. As such, Applicants respectfully submits that Claims 25 and 26 are patentable.

CONCLUSION

Applicants respectfully submit that the claims as amended and new claims overcome the rejection raised by the Examiner and that the claims are patentable. Applicants therefore respectfully request allowance of the application. It is therefore respectfully requested that a Notice of Allowance be issued. The Examiner is encouraged to contact Applicants' undersigned attorney to resolve any remaining issues in order to expedite examination of the present application.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required

Appl. No.: 09/842,052 Amdt. dated 05/12/2005

Reply to Office action of January 12, 2005

therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,

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